

EXHIBIT A

[Counsel Listed on Signature Pages]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

People of the State of California, et al.

v.

*Meta Platforms, Inc., Instagram, LLC, Meta
Payments, Inc., Meta Platforms Technologies, LLC*

*Office of the Attorney General, State of Florida
Department of Legal Affairs*

v.

Meta Platforms, Inc., Instagram LLC

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

THIS DOCUMENT RELATES TO:
4:23-cv-05448

MDL No. 3047

Case No. 4:23-cv-05448-YGR

4:23-cv-05885-YGR

Honorable Yvonne Gonzalez Rogers

**META DEFENDANTS' FOURTH
REQUEST FOR PRODUCTION OF
DOCUMENTS TO PLAINTIFF STATE
OF NEW JERSEY**

**META DEFENDANTS' FOURTH REQUEST FOR PRODUCTION OF DOCUMENTS
TO PLAINTIFF STATE OF NEW JERSEY**

Defendants Meta Platforms, Inc., Instagram, LLC, Meta Payments, Inc., and Meta Platforms Technologies, LLC (collectively, “Defendants”), pursuant to Federal Rules of Civil Procedure 26 and 34, hereby propound the following Fourth Request for Production of Documents to Plaintiff State of New Jersey (“Plaintiff”). These Requests are to be responded to fully and separately as required by the Federal Rules of Civil Procedure.

Defendants request that Plaintiff serve its responses to these Requests upon counsel for Defendants at Covington & Burling LLP; 1999 Avenue of the Stars, Los Angeles, California, 90067-4643 within thirty (30) days. The following Definitions and Instructions are applicable to these Requests:

DEFINITIONS

1. The term “communication” means the transmittal of information (in the form of facts, ideas, inquiries or otherwise).

2. “Document” or “documents” shall have the meaning set forth in the Order Governing the Production of Electronically Stored Information and Hard Copy Documents entered in this action (“ESI Order”). *See* ECF No. 690.

3. “Relating” or “related to” means and includes referring to, concerning, referencing, mentioning, associated with, constituting, discussing, containing, embodying, recording, reflecting, identifying, summarizing, incorporating, and/or dealing with or pertaining to in any way.

4. “Identify” when used in reference to:

a. a natural individual, requests that individual’s full name, occupation, current or last known residential and business addresses, and current or last known residential and business telephone numbers;

b. a document, requests the nature of the document (*e.g.*, letter or memorandum), its title, its date, the name(s) of its authors and recipients, and its present location or custodian;

c. a communication, requests the identification of any document(s) that evidence the communication, an identification of the person(s) participating in the communication, and the date, and substance of the communication.

5. “Action” refers to the present proceeding which was commenced by Plaintiff’s filing of the Civil Enforcement Complaint on October 24, 2023, in the United States District Court for the Northern District of California.

6. “Plaintiff”, “You”, “you”, “Your” and “your” means the State, including but not limited to the executive and legislative branches, agencies, offices, departments, divisions, commissions, committees, agents, employees, boards, instrumentalities, vendors (to the extent the State has possession, custody, or control over them), administrators, and other persons or entities acting on behalf of the State, including but not limited to the agencies and other entities whose information has been deemed within the State’s control for the purposes of discovery in Magistrate Judge Kang’s September 6, 2024 order (ECF No. 1117) and any other related entities.

7. “Defendants” refers to Meta Platforms, Inc., Instagram, LLC, Meta Payments, Inc., and Meta Platforms Technologies, LLC.

8. “And” includes “or”, and vice versa.

9. The singular form of a word or term includes the plural, and vice versa.

10. The present tense of a verb includes the past tense, and vice versa.

11. The use of the article “the” shall not be construed as limiting the scope of any request.

12. “Including” means “including without limitation”.

13. “Any” includes “all”, and vice versa.

14. “State” means the State of New Jersey.

15. The capitalized version of a word or term includes the lower case version of a word or term, and vice versa.

All words, terms, and phrases not specifically defined herein are to be given their normal and customary meaning in the context in which they are used in these Requests.

INSTRUCTIONS

1. Plaintiff is requested to furnish all documents and information in Plaintiff's possession, custody, or control, to the extent not privileged. Documents held by any office, department, agency, board, commission, or instrumentality of the state are within Plaintiff's possession, custody, or control.

2. If Plaintiff objects to furnishing any of the documents or information requested by these Requests based on a claim of attorney-client privilege, work product protection, or any other applicable privilege or claim of protection, such information should be redacted and/or logged in accordance with the Order Regarding Protected Counsel Communications and Governing Privilege Log Protocol entered in this action. *See* ECF No. 740.

3. If Plaintiff objects to any Request on the grounds that it is vague or ambiguous, state: (i) the portions or terms of such Request that Plaintiff claims to be vague or ambiguous; and (ii) the interpretation of the Request pursuant to which Plaintiff provides a response.

4. These Requests are deemed to be continuing in nature and require Plaintiff to timely serve supplemental responses or productions in accordance with Rule 26(e) of the Federal Rules of Civil Procedure, up to and including the time of a trial or hearing in this matter. All supplemental responses shall include the date upon which and the manner in which such further or different information was acquired or became known to Plaintiff.

5. If Plaintiff cannot fully respond to a particular Request after exercising due diligence to make inquiry and to secure the necessary information, provide a response to the extent possible, specifying Plaintiff's inability to respond to the remainder and providing whatever information or knowledge Plaintiff has concerning the portion not responded to.

6. All responsive and non-privileged or redacted documents shall be produced in the format ordered by the Court in the ESI Order.

7. Unless otherwise specified, the time period for these Requests is September 17, 2024 to October 30, 2024.

SPECIFIC REQUESTS FOR PRODUCTION

1. All Documents Relating to or reflecting any communication with the State Attorney General's Office regarding or Relating to Instagram Teen Accounts.

RESPONSE:

Respectfully submitted,

Dated: March 4, 2025

COVINGTON & BURLING LLP

By: /s/ Ashley M. Simonsen

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LLC; Meta Payments, Inc.; and Meta
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CERTIFICATE OF SERVICE

I hereby certify that on March 4, 2025, a true and correct copy of Meta Defendants' Fourth Request for Production of Documents to Plaintiff State of New Jersey were served upon the following by email:

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By: /s/ Ashley M. Simonsen
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